

HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

MOTOROLA, INC., et al.,

Defendants.

No. C10-1823-JLR

DECLARATION OF SHANE P.
CRAMER IN SUPPORT OF
MICROSOFT'S MOTION TO FILE
DOCUMENTS UNDER SEAL

NOTED FOR:
Friday, December 2, 2011

MOTOROLA MOBILITY, INC., et al.,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

I, Shane P. Cramer, declare as follows:

1. I am one of the attorneys for Microsoft Corporation ("Microsoft") in the above captioned action, am over age 18, and competent to be a witness. I am making this declaration based on facts within my own personal knowledge.

2. The Declaration of Jennifer Ochs on Behalf of Microsoft Corporation was filed in a pending International Trade Commission action involving these same parties (*In the*

DECLARATION OF SHANE P. CRAMER IN
SUPPORT OF MICROSOFT'S MOTION TO FILE
DOCUMENTS UNDER SEAL - 1

LAW OFFICES
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1 *Matter of Certain Gaming and Entertainment Consoles, Related Software, and Components*
2 *Thereof*, Inv. No. 337-TA-752) (the "ITC Action") on November 11, 2011. It was designated
3 as "Confidential Business Information, Subject to [the] Protective Order" entered by the
4 Administrative Law Judge in the ITC Action.

5 3. The Ochs Declaration contains non-public, commercially sensitive information
6 relating to Marvell's business and licensing dealings with the parties to this Action.
7 Disclosure of this information to non-parties or party employees who are not covered by the
8 Protective Order has the potential to negatively affect one or more of these entities' positions
9 in the marketplace, and could potentially lead to competitive harm.

10 I declare under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct.

12 DATED this 14th day of November, 2011, in Seattle, Washington.

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15 SHANE P. CRAMER
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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Attorneys for Defendants Motorola Solutions, Inc., Motorola Mobility, Inc., and General Instrument Corporation

Philip S. McCune
Lynn M. Engle
Summit Law Group

Steven Pepe
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/s/ Susie Clifford